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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ZACK KAPLAN, BEN KAPLAN,
MICHAEL KAPLAN, ELI KAPLAN, and
MICHAEL MAZZOTTA, Individually
and on Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

v.

ALEXANDER MASHINSKY,
SHLOMI "DANIEL" LEON, HANOCH
GOLDSTEIN, HARUMI URATA-
THOMPSON, JEREMIE BEAUDRY,
KRISTINE MASHINSKY, AM
VENTURES HOLDING, INC.,
KOALA1 LLC, and WINTERMUTE
TRADING LTD.,

Defendants.

The Hon. Susan D. Wigenton

Civ No. 22-04560-SDW-SDA

Motion Return Date:
July 21, 2025

ORAL ARGUMENT
REQUESTED

**NOTICE OF MOTION TO TRANSFER TO THE U.S. DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE that on July 21, 2025, or as soon thereafter as
the matter may be heard, Defendants Harumi Urata-Thompson, through Jamie

Hoxie Solano, Esq., Eric S. Rosen, Esq., and Constantine Economides, Esq., of Dynamis LLP; Alexander Mashinsky, appearing *pro se*; Jeremie Beaudry, through Thaddeus D. Wilson, Esq., and Kevin J. O'Brien, Esq., of King and Spalding LLP; and Kristine Meehan,¹ through Leigh M. Nathanson, Esq. of King and Spalding LLP (collectively, "Moving Defendants") will move before the Honorable Susan D. Wigenton, United States District Judge for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, Courtroom 5C, for an Order to transfer the above-captioned matter to the United States District Court for the Southern District of New York, pursuant to the: (i) first-filed rule and/or (ii) 28 U.S.C. § 1404.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the Moving Defendants will rely upon the accompanying Memorandum of Law, the pleadings submitted in this action, the papers and records on file herein, and any additional evidence requested by the Court on this matter.

PLEASE TAKE FURTHER NOTICE that a proposed Order granted the Moving Defendants' requested relief is being submitted herewith.

¹ Ms. Meehan is incorrectly identified in the FAC as "Kristine Mashinsky," which is not her legal name.

Dated: June 25, 2025

Respectfully submitted,

s/ Jamie Hoxie Solano

Jamie Hoxie Solano

Eric S. Rosen

Constantine P. Economides

DYNAMIS LLP

Counsel for Defendant Harumi

Urata-Thompson

s/ Leigh M. Nathanson

Leigh M. Nathanson

KING & SPALDING LLP

Counsel for Defendant

Kristine Meehan

s/ Thaddeus D. Wilson

Thaddeus D. Wilson

Kevin J. O'Brien

KING & SPALDING LLP

Counsel for Defendant Jeremie Beaudry

s/ Alexander Mashinky

Alexander Mashinsky

Pro se Defendant

CERTIFICATE OF SERVICE

I, Jamie Hoxie Solano of Dynamis LLP, hereby certify that on June 25, 2025, I served the foregoing upon all counsel of record by filing on CM/ECF, and by sending a copy of this filing to Mr. Mashinsky via e-mail at alex@mashinsky.com, by which he has agreed to accept service.

/s/ Jamie Hoxie Solano
Jamie Hoxie Solano, Esq.